

DR. ORLY TAITZ ESQ

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FILED
DEC 18 2012
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INDIANAPOLIS, INDIANA

IN THE US DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JUDICIAL WATCH ET AL) Case #12-cv-800
V) Hon William Lawrence presiding
BRADLEY KING ET AL) Motion to intervene

MOTION TO INTERVENE

Pursuant to Federal Rule of Civil Procedure 24(b)(2), Plaintiff -Intervenor Dr. Orly Taitz, ESQ, President of not for profit "Defend Our Freedoms" foundation is seeking to intervene as her action shares a common question of law or fact.

MEMORANDUM OF POINTS AND AUTHORITIES

1. Dr. Orly Taitz esq has filed two formal HAVA complaints of elections fraud with the office of the Secretary of State of Indiana prior to 2012 Presidential election.
2. First fully executed and notarized complaint and 208 pages of exhibits were filed on 02.09.2012 by certified mail with the office of the Secretary of state and was also e-mailed to both co directors of the elections commission Brad King and Trent Deckert.
3. For over 10 months Taitz did not receive a response to her complaint.
4. In September 2012 Taitz personally hand delivered a second fully executed and notarized official HAVA elections fraud complaint to the office of the Secretary of State. She was accompanied by a witness, citizen of Indiana, Mr. Karl Swihart, who submitted his own duly signed and notarized

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HAVA elections fraud complaint. As of today, December 12, 2012, I did not receive any response to either one of the complaints.

5. Taitz is both a doctor and an attorney and the president of "Defend our Freedoms" not for profit foundation. Taitz and her family were able to escape a communist Soviet Union. An uncle of Taitz was a famous "Refusnik", dissident against the Soviet regime. Taitz started her foundation in order to fight elections fraud and rampant corruption in the government, to make sure United States does not become another Soviet Union with deprivation of voting rights and other Constitutional freedoms. A number of the members and supporters of "defend our freedoms Freedoms" are citizens of Indiana. "Defend Our Freedoms" is being supported by Taitz herself through her income as a doctor of dental Surgery and by her supporters.
6. Taitz believes that the Secretary of State of Indiana and the Elections Commission of Indiana are aiding and abetting elections fraud by ignoring complaints of elections fraud.
7. FRCP 24(b)2 allows intervener action when there is a common question of law and fact.
8. Taitz believes that her rights and rights of Indiana members of "Defend Our Freedoms Foundation would be infringed upon if intervener motion is not granted. The interests of Judicial economy would also favor granting Taitz and Defend our Freedoms intervener status versus them filing a separate complaint.

CONCLUSION

Due to all of the above intervener motion should be granted

Respectfully submitted Dr. Orly Taitz, ESQ

/s/ Dr. Orly TAITZ, ESQ



SWORN DECLARATION OF ORLY TAITZ IN SUPPORT OF INTERVENER MOTION

1. I, Orly Taitz, President of "Defend Our Freedoms Foundation" filed two formal HAVA complaints of elections fraud with the office of the Secretary of State of Indiana prior to 2012 Presidential election.
2. First fully executed and notarized complaint and 208 pages of exhibits were filed on 02.09.2012 by certified mail with the office of the Secretary of state and was also e-mailed to both co directors of the elections commission Brad King and Trent Deckert.
3. For over 10 months I did not receive a response to her complaint.
4. In September 2012 I personally hand delivered a second fully executed and notarized official HAVA elections fraud complaint to the office of the Secretary of State. She was accompanied by a witness, citizen of Indiana, Mr. Karl Swihart, who submitted his own duly signed and notarized HAVA elections fraud complaint. As of today, December 12, 2012, I did not receive any response to either one of the complaints.
5. I am both a doctor and an attorney and the president of "Defend our Freedoms" not for profit foundation. My family and I were able to escape a communist Soviet Union. My uncle was a

famous "Refusnik", dissident against the Soviet regime. I started my foundation in order to fight elections fraud and rampant corruption in the government, to make sure United States does not become another Soviet Union with depravation of voting rights and other Constitutional freedoms. A number of the members and supporters of "Defend our Freedoms" are citizens of Indiana. "Defend Our Freedoms" is being supported by me through my income as a doctor of dental Surgery and by my supporters.

6. I believe that the Secretary of State of Indiana and the Elections Commission of Indiana are aiding and abetting elections fraud by ignoring complaints of elections fraud.
7. FRCP 24(b)2 allows intervener action when there is a common question of law and fact.
8. I believe that my rights and rights of Indiana members of "Defend Our Freedoms Foundation would be infringed upon if intervener motion is not granted. The interests of Judicial economy would also favor granting Taitz and Defend our Freedoms intervener status versus them filing a separate complaint.

/S./ Dr. Orly Taitz, ESQ



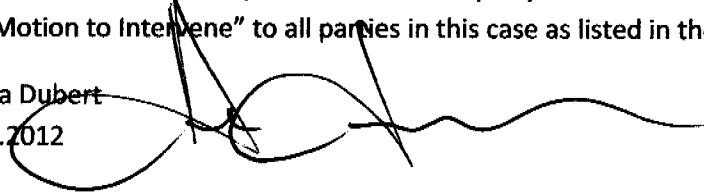
12.12.2012.

Certificate of Service

I, Lila Dubert, over 18 years old and not a party in this case attest that I mailed a copy of this "Motion to Intervene" to all parties in this case as listed in the distribution list below

/s/ Lila Dubert

12.12.2012



Plaintiff

JUDICIAL WATCH, INC.

*in its individual, corporate capacity
and on behalf of certain of its
members*

represented by **Chris Fedeli**

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V.

Defendant

J. BRADLEY KING

*Co-Director of the Indiana Election
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ATTORNEY TO BE NOTICED

Defendant

TRENT DECKARD

*Co-Director of the Indiana Election
Division, in his official capacities*

represented by **Don R. Hostetler**
(See above for address)
ATTORNEY TO BE NOTICED

Jefferson S. Garn
(See above for address)
ATTORNEY TO BE NOTICED

Defendant

CONNIE LAWSON

*Indiana Secretary of State, in her
official capacity*

represented by **Don R. Hostetler**
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ATTORNEY TO BE NOTICED

Jefferson S. Garn
(See above for address)
ATTORNEY TO BE NOTICED